IN RE: HEATHER L. LEHR : CASE NO.: 1:17-bk-03926-HWV

:

: CHAPTER 13

DEBTOR'S MOTION TO AUTHORIZE WAGE ATTACHMENT

AND NOW COMES, Debtor, Heather Lehr, by and through her attorneys, Jacobson & Julius, and hereby files this Motion to Authorize Wage Attachment and in support thereof states as follows:

- 1. Debtor filed a Chapter 13 Petition on or about September 22, 2017.
- 2. Debtor receives regular income from employment at the Dallastown Area School District that may be attached under 11 U.S.C § 1326 to fund Debtor's Chapter 13 Plan.
- 3. The likelihood of success in this case will be much greater if Debtor's income is attached to fund the plan.
 - 4. Debtor consents to the wage attachment.

WHEREFORE, Debtor respectfully requests that this Court enter an order directing the abovementioned employer to pay the Chapter 13 Trustee in the amount set forth in the attached *Order*.

Respectfully Submitted,

JACOBSON & JULIUS

Dated: November 1, 2017 s/Chad J. Julius

ID# 209496 8150 Derry Street

Harrisburg, PA 17111.5260

717.909.5858 717.909.7788 [fax]

IN RE: HEATHER L. LEHR : CASE NO.: 1:17-bk-03926-HWV

:

: CHAPTER 13

DEBTOR'S CONSENT TO VOLUNTARY WAGE ATTACHMENT

I, Heather L. Lehr, do hereby consent to an attachment of my wages for the purpose of funding my Chapter 13 Plan.

Date: October 31, 2017 s/Heather L Lehr

IN RE: HEATHER L. LEHR : CASE NO.: 1:17-bk-03926-HWV

:

: CHAPTER 13

PROOF OF SERVICE

AND NOW, this 1st day of November, 2017, I, Tiffany Ramsey, with Jacobson & Julius, attorneys for the Debtor, hereby certify that on this day I served the within *Motion to Authorize Wage Attachment* upon the following persons by forwarding the same via CM/ECF or first class mail—

Charles J. DeHart, III, Esq. Office of U.S. Trustee 8125 Adams Drive POB 969 Hummelstown, PA 17036 Harrisburg, PA 17108.0969

> Attn: Jodi Schuer Payroll Supervisor Dallastown Area School District 700 New School Lane Dallastown, Pennsylvania 17313

> > By: <u>s/Tiffany Ramsey</u>

Tiffany Ramsey, Paralegal

IN RE: HEATHER L. LEHR : CASE NO.: 1:17-bk-03926-HWV

:

: CHAPTER 13

ORDER

UPON CONSIDERATION of the above-referenced Debtor having filed a *Petition* under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute,

IT IS HEREBY ORDERED that until further *Order* of this Court, the entity from whom Debtor receives income:

Attn: Jodi Schuer Payroll Supervisor Dallastown Area School District 700 New School Lane Dallastown, Pennsylvania 17313

should deduct from said Debtor's income the sum of \$143.00 from each bi-weekly paycheck, beginning on the next pay day following receipt of this *Order* and deduct a similar amount each pay period thereafter, including any period from which Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to the above Debtor and to remit the deductible sums to:

Charles J. DeHart, III Standing Chapter 13 Trustee POB 7005 Lancaster, PA 17604

IT IS FURTHER ORDERED that the entity from whom Debtor receives income shall notify the above listed Trustee if Debtor's income is terminated and the reason therefore.

IT IS FURTHER ORDERED that all remaining income of Debtor, except the amounts required to be withheld for taxes, social security, insurance, pension, or union dues be paid to Debtor in accordance with usual payment procedure.

IT IS FURTHER ORDERED that the entity from whom Debtor receives income will place the Bankruptcy Case Number [1:17-bk-03926- HWV] and the name of Debtor on all checks being forwarded to the above listed Trustee to ensure proper accounting of the funds.